

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

UNITED HEALTHCARE SERVICES, INC.,
UNITEDHEALTHCARE INSURANCE
COMPANY, AND UMR, INC.,

Plaintiffs,

v.

TEAM HEALTH HOLDINGS, INC.,
AMERITEAM SERVICES, LLC, and HCFS
HEALTH CARE FINANCIAL SERVICES,
LLC,

Defendants.

Case No. 3:21-CV-00364-DCLC-JEM

**JOINT MOTION FOR ENTRY OF STIPULATED CONFIDENTIALITY AND
PROTECTIVE ORDER**

Plaintiffs United Healthcare Services, Inc., UnitedHealthcare Insurance Company, and UMR, Inc. and Defendants Team Health Holdings, Inc., Ameriteam Services, LLC, and HCFS Health Care Financial Services, LLC have conferred and agreed upon the terms of a Stipulated Confidentiality and Protective Order to govern material shared during discovery in this matter. In support of this motion, the Parties would show that the terms of the attached protective order are required to protect trade secrets and confidential commercial, financial, or other private and proprietary information, the disclosure of which would risk substantial harm to the producing party. As such, the Parties respectfully request that the Court enter the Stipulated Confidentiality and Protective Order, attached hereto as Exhibit A.

Respectfully submitted,

Dated: November 22, 2022.

PAINÉ, TARWATER & BICKERS, LLP

/s/ Kendall G. Vonckx

Dwight E. Tarwater (BPR #007244)
det@painertarwater.com
Michael J. King (BPR #015523)
mjk@painebickers.com
Kendell G. Vonckx (BPR #035139)
kgv@painertarwater.com
900 South Gay Street, Suite 2200
Knoxville, TN 37902-1821
Telephone: 865-525-0880
Facsimile: 865-521-7441

and

Jeffrey S. Gleason (*pro hac vice*)
jgleason@robinskaplan.com
Jamie R. Kurtz (*pro hac vice*)
jkurtz@robinskaplan.com
Charley C. Gokey (*pro hac vice*)
cgokey@robinskaplan.com
Robins Kaplan LLP
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402-2015
T: (612) 349-8500

and

Paul D. Weller (*pro hac vice*)
pweller@robinskaplan.com
Gregory S. Voshell (*pro hac vice*)
gvoshell@robinskaplan.com
900 Third Avenue
Suite 11900
New York, New York 10022
T: (212) 980-7400

Counsel for the Plaintiffs

**BAKER, DONELSON, BEARMAN, CALDWELL
& BERKOWITZ, P.C.**

/s/ Caldwell G. Collins

Gary C. Shockley (BPR 010104)
Caldwell G. Collins (BPR 028452)
1600 West End Avenue, Suite 2000
Nashville, Tennessee 37203
(615) 726-5704 (phone)
(615) 744-5704 (fax)
gshockley@bakerdonelson.com
cacollins@bakerdonelson.com

Nora A. Koffman (BPR 038025)
602 Sevier Street, Suite 300
Johnson City, TN 37604
(423) 928-0181(phone)
nkoffman@bakerdonelson.com

Matthew S. Mulqueen (BPR 028418)
W. Preston Battle IV (BPR 035044)
165 Madison Avenue, Suite 2000
Memphis, TN 38103
(901) 526-2000 (phone)
mmulqueen@bakerdonelson.com
pbattle@bakerdonelson.com

and

Martin B. Goldberg (FL BPR 827029)
(*Admitted pro hac vice*)
Justin C. Fineberg (FL BPR 53716)
(*Admitted pro hac vice*)
Lash & Goldberg LLP
2500 West Road, Suite 2200
Fort Lauderdale, FL 33331
(954) 384-2500 (phone)
mgoldberg@lashgoldberg.com
jfineberg@lashgoldberg.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2022, I caused the foregoing to be filed with the Court by the electronic filing system, which will send a copy electronically to all counsel of record.

/s/ Kendell G. Vonckx